

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

State of New York, *et al.*

*Plaintiffs,*

*v.*

Case No. 1:25-cv-1144-JAV

U.S. Department of the Treasury, *et. al.*

*Defendants.*

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I, Daniel Katz, hereby declare upon penalty of perjury:

1. I am the Chief of Staff of the Department of the Treasury (Treasury), and I have served in this role since January 20, 2025. In this role, I am the primary aide to the Secretary responsible for exercising supervision over the Deputy Chiefs of Staff, Executive Secretary, Director of Scheduling, and other officials and offices within the Office of the Chief of Staff. In my role as Chief of Staff, I am the primary official responsible for assisting the Secretary in overseeing the work of the Department of Government Efficiency (DOGE) team established at Treasury (Treasury DOGE Team). I make this declaration to provide updated information regarding the Treasury DOGE Team members and the reporting structure of the Treasury DOGE Team.
2. In my declaration of March 4, 2025 (March 4<sup>th</sup> Declaration), I stated that the Treasury DOGE Team members were Thomas Krause, Linda Whitridge, Ryan Wunderly (who replaced Marko Elez following his resignation), Sam Corcos, and Gavin Kliger. I further stated that all Treasury DOGE Team members except for Mr. Kliger were

Treasury employees, and that Mr. Kliger was a detailee to the Internal Revenue Service (IRS) from the Office of Personnel Management.

3. The current members of the Treasury DOGE Team are Thomas Krause, Linda Whitridge, Ryan Wunderly, Sam Corcos, and Todd Newnam. Since my March 4<sup>th</sup> Declaration, Mr. Newnam has onboarded as a Treasury employee. Also, since my last declaration, Mr. Kliger's detail agreement with the IRS has been terminated and he is no longer a Treasury DOGE Team member.
4. In my March 4<sup>th</sup> Declaration, I also stated that Mr. Krause is the Treasury DOGE Team Lead. Currently, Mr. Krause is the Treasury DOGE Team Lead as it relates to the Bureau of the Fiscal Service payment systems. Mr. Newnam is the Treasury DOGE Team Lead with respect to all other Treasury and IRS DOGE matters. Although members of Treasury DOGE Team collaborate closely with staff at the U.S. DOGE Service consistent with direction from the Secretary and myself, they do not report to anyone outside of the Treasury Department.
5. All current members of the Treasury DOGE Team are Treasury employees. Mr. Krause and Mr. Newnam report directly to me within the Office of the Chief of Staff.<sup>1</sup> Ms. Whitridge and Mr. Wunderly report directly to Mr. Krause, and Mr. Corcos reports directly to Mr. Newnam.

I declare the foregoing to be true and correct, upon penalty of perjury.

Dated: 4/24/25

Signed 

Daniel Katz  
Chief of Staff  
U.S. Department of the Treasury

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<sup>1</sup> Mr. Krause also continues to perform the duties of the Fiscal Assistant Secretary. With respect to those duties, he currently reports directly to the Secretary.